



**Office of the New York State  
Attorney General**

**Letitia James  
Attorney General**

July 28, 2025

**By ECF**

Honorable Robert W. Lehrburger  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Garrett v. City Univ. of New York*, No. 24-cv-9710 (VSB)(RWL)

Dear Judge Lehrburger:

This Office represents defendant City University of New York (“CUNY”) in the above-referenced matter. Pursuant to the Civil Case Management Plan and Scheduling Order in this matter, so-ordered by the Court on April 30, 2025, ECF No. 25, I submit this joint status letter on behalf of the parties.

The parties are engaged in discovery. The parties exchanged Rule 26 Initial Disclosures on May 15, 2025, written discovery requests on June 12, 2025, and responses and objections on July 25, 2025. The parties are negotiating the parameters for e-discovery and the terms of a confidentiality agreement and protective order. Once the parties have come to an agreement on the confidentiality agreement and protective order, they will submit it to the Court for approval.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/ Shaina Schwartz  
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cc: All counsel of record (*via* ECF)